

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

SPECTRUM WT,

Plaintiffs,

v.

WALTER WENDLER, *et al.*,

Defendants.

No. 2:23-cv-00048

**JOINT MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**

Pursuant to Federal Rule of Civil Procedure 26(c), and Federal Rule of Evidence 502(d), and for the good cause explained below and in the respective attachments, the parties respectfully submit this joint motion for entry of agreed upon protective order, attached hereto as Exhibit A.

In support of their joint motion, the Parties state as follows:

1. The parties have conferred and agree that the terms and conditions of the attached proposed protective order are appropriate to protect information produced in discovery in this case and regarded by one or more parties as confidential and/or proprietary, and to limit the use of such information to that necessary for the purposes of this case.
2. The parties therefore request that and/or proprietary court enter the attached proposed protective order.

Date: December 9, 2025

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

RALPH MOLINA  
Deputy First Assistant Attorney General

RYAN D. WALTERS  
Deputy Attorney General for Legal Strategy

RYAN G. KERCHER  
Chief, Special Litigation Division

/s/ David Bryant  
DAVID BRYANT  
Special Counsel  
Tex. State Bar No. 03281500

MUNERA AL-FUHAID  
Special Counsel  
Tex. State Bar No. 24094501

ZACHARY BERG  
Special Counsel  
Tex. State Bar No. 24107706

ALEXIA K. BAKER  
Assistant Attorney General  
Tex. State Bar No. 24149596

OFFICE OF THE ATTORNEY GENERAL  
P.O. Box 12548 (MC-009)  
Austin, Texas 78711-2548  
Tel.: (512) 463-2120  
Fax: (512) 320-0667  
david.bryant@oag.texas.gov  
munera.al-fuhaid@oag.texas.gov  
zachary.berg@oag.texas.gov  
alexia.baker@oag.texas.gov

***COUNSEL FOR DEFENDANTS***

Respectfully submitted.

/s/ JT Morris  
JT Morris  
TX Bar No. 24094444  
Conor T. Fitzpatrick\*  
MI Bar No. P78981  
Foundation for Individual Rights  
and Expression  
700 Pennsylvania Ave., SE; Ste. 340  
Washington, DC 20003  
Tel: (215) 717-3473  
Fax: (267) 573-3073  
jt.morris@thefire.org  
conor.fitzpatrick@thefire.org

Adam B. Steinbaugh\*  
CA Bar No. 304829  
Jeffrey D. Zeman\*  
MI Bar No. P76610  
FOUNDATION FOR INDIVIDUAL RIGHTS AND  
EXPRESSION  
510 Walnut St.; Ste. 900  
Philadelphia, PA 19106  
Tel: (215) 717-3473  
Fax: (267) 573-3073  
adam@thefire.org  
jeff.zeman@thefire.org

\* Admitted *Pro Hac Vice*

***COUNSEL FOR PLAINTIFF***

**CERTIFICATE OF SERVICE**

I hereby certify that on December 9, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all registered CM/ECF users.

*/s/ David Bryant*

---

DAVID BRYANT